

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SHANE K. HOPKINS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 05-870-SLR
	)	
JOHN PUSEY, JOSEPH SMITH,	)	
DAVID PIERCE, LISE MERSON,	)	
JUDITH MULLEN, DREWRY FENNELL,	)	
M. JANE BRADY	)	
	)	
Defendants.	)	

**DEFENDANTS PUSEY AND SMITH'S REQUEST  
FOR PRODUCTION OF DOCUMENTS AND THINGS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants, through their undersigned counsel, hereby serve on Plaintiff, Shane Hopkins, the following Requests for Production of Documents and Things.

**INSTRUCTIONS**

A. If any document or thing required to answer any Request for Production is withheld because you claim that such information is privileged or is contained in a privileged document or communication:

- (1) identify each such document with sufficient specificity to permit a court to determine the propriety of the asserted privilege and setting forth the nature of the document;
- (2) identify the privilege and set forth the factual basis for the privilege claims; and
- (3) set forth each Request to which each such document or thing is responsive.

B. These Requests for Production are continuing in nature and, if applicable, will

require supplemental responses pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

**REQUESTS FOR PRODUCTION**

**REQUEST NO. 1:**

All grievances, complaints, or other correspondence relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint, including, but not limited to, all grievances or complaints submitted by Plaintiff to Department of Correction personnel, responses thereto, and any related correspondence between Plaintiff and Department of Correction personnel.

**REQUEST NO. 2:**

All correspondence relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint, including, but not limited to, any correspondence between friends or family members of Plaintiff or other inmates, Department of Correction personnel, the Attorney General's Office, and the ACLU.

**REQUEST NO. 3:**

Any statements, declarations, petitions, or affidavits relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint and any statements, declarations, or affidavits of Plaintiff, other inmates, or witnesses to the allegations in the Complaint.

**REQUEST NO. 4:**

All documents identified or referenced in Plaintiff's Answers to Defendants' First Set of Interrogatories, served contemporaneously herewith.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/Lisa Barchi  
Lisa Barchi I.D. # 3927  
Deputy Attorney General  
Department of Justice  
820 N. French Street, 6th floor  
Wilmington, DE 19801  
(302) 577-8400  
[lisa.barchi@state.de.us](mailto:lisa.barchi@state.de.us)

Date: November 21, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2006, I electronically filed *Defendants Pusey and Smith's Request for Production of Documents to Plaintiff* with the Clerk of Court using CM/ECF. I hereby certify that on November 21, 2006 I have mailed by United States Postal Service, the document to the following non-registered participants:

Shane Hopkins  
SBI # 253918  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Lisa Barchi  
Deputy Attorney General  
Department of Justice  
820 N. French Street, 6th Floor  
Wilmington, DE 19801  
(302) 577-8400  
lisa.barchi@state.de.us